result is that Qwest is demanding substantially higher prices for DS-0 and DS-1 loops. As McLeodUSA summarizes,

> Qwest has proposed only uneconomical, onerous, and non-negotiable offerings to replace the Section 251(c)(3) network elements for the affected wire centers [in the Omaha MSA]. Its demands include prices increases in the range of 30% or more for monthly charges for DS0 stand alone loops, a minimum increase of 86 percent for DS1 access loops, and a 360% increase in associated non-recurring charges for installing DS1 access loops. . . . Qwest's actions cannot be reconciled either with the Commission's confidence that market incentives would motivate it to meet its obligations to provide wholesale access to network elements pursuant to Section 271, or with the public interest standard articulated in Section 10(c).

Id. at i. Because it is not economical for McLeodUSA to use Qwest's post-forbearance offerings to provide DS-0 or DS-1-based services to business customers, McLeodUSA has publicly announced that it will discontinue its operations in the Omaha MSA if the Commission does not modify its *Omaha Order*.[43] Moreover, McLeodUSA has been unable to sell its facilities because potential buyers have been deterred by the "lack of reasonable wholesale pricing for last mile loop facilities." McLeodUSA Petition at 18.

As a direct result of McLeodUSA's difficulty in negotiating reasonable "commercial" pricing for voice-grade and high-capacity loops from Qwest, Integra abandoned its plans to enter the Omaha MSA.[44] As McLeodUSA explains,

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[43] McLeodUSA Petition at 14 ("The nine affected wire centers represent the vast majority of revenue opportunity of McLeodUSA's current and prospective customer base. Accordingly, McLeodUSA is being forced to exit all Omaha wire centers because there is simply not enough revenue potential in the unaffected Omaha wire centers to justify the ongoing operating costs of the local switching center and related expenses.").

[44] *Id.* at 18 (citing Comments of Integra Telecom, Inc., *In re Petitions of the Verizon Tel. Cos. for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Boston, New York, Philadelphia, Pittsburgh, Providence and Virginia Beach Statistical Areas*, WC Dkt. No. 06-172, at 4-5 (filed Mar. 5, 2007)).

> Integra found that it was "substantially less attractive economically to enter the Omaha market without access to unbundled network elements at TELRIC rates in the entire Omaha market" and decided that the investments it was prepared to make to provide service in Omaha would be better utilized in other markets. It emphasized . . . that it would be extremely difficult for a CLEC to provide service to small and medium business customers in competition with the ILEC if loops and transport were priced at special access rates.

Id.

Thus, the experience of CLECs in the Omaha MSA demonstrates that unbundling requirements are necessary in the absence of market-based incentives to ensure that Qwest does not engage in similar anticompetitive conduct in the Denver, Minneapolis, Phoenix, and Seattle MSAs.

B. If Qwest's Forbearance Request Were Granted, Competitive Carriers Would Be Price Squeezed Out Of The Market For DS-0, DS-1, and DS-3-Based Services.

If Qwest's instant forbearance request were granted, the experience of intramodal competitors in the four MSAs at issue will be no different from that of McLeodUSA and Integra in the Omaha MSA. The elimination of UNEs would leave Qwest's wholesale customers, by virtue of Qwest's control over essential local transmission facilities, no choice but to rely on loop and transport facilities as special access at significantly higher rates, resulting in a price squeeze.

Eschelon recently conducted studies of the likely financial impact of the elimination of UNEs on its business in the four MSAs at issue.[45] The studies examined the costs it incurs to provide services via DS-1 enhanced extended loops ("EELs"), stand-alone DS-1 loops and DS-0 loops in the Denver, Minneapolis, Phoenix, and Seattle MSAs and the changes to Eschelon's operating margins in the event that Qwest's forbearance request were granted. *Id.* The results of

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[45] Declaration of William D. Markert On Behalf Of Eschelon Telecom, Inc. ¶ 3 (attached hereto as Attachment D) ("Markert Dec.").

the studies were that for DS-1 EELs, Qwest's special access prices would increase Eschelon's costs to the point that its operating cash flow margin would be approximately **[proprietary begin]** **[proprietary end]** in each density zone of the MSAs at issue. *Id.* ¶ 6. According to William Markert, Eschelon's Executive Vice President of Network Financial Management, at that point, "financial institutions would not extend credit to Eschelon nor would potential investors invest in the company," and as a result, "Eschelon would be forced to exist the market for DS-1-based services in these four MSAs." *Id.* Mr. Markert also notes in his analysis that, without the constraining effect of the availability of UNEs, Qwest might increase its special access prices even further. *Id.* ¶ 7. Moreover, in addition to increasing the costs of wholesale inputs, Qwest may simultaneously decrease its retail prices. *Id.* According to Mr. Markert, Qwest has in fact already done so by offering a promotional retail rate of $461.00 for a DS-1 EEL. *Id.* & n.2. The result of Qwest's exercise of its market power in this manner would be to impose a price squeeze on Eschelon, rendering it unable to make a profit and thereby forcing it to withdraw from the DS1-based services market. *Id.* ¶ 7. Mr. Markert's DS-0 loop cost study **[proprietary begin]**

[proprietary end]. While the stand-alone DS-1 loop cost study **[proprietary begin]**

[proprietary end], the margins across all density zones in the four MSAs at issue were **[proprietary begin]**

[proprietary end] *Id.* ¶ 8.

C. There Is Even Less Evidence To Support A Prediction That Cable Companies Would Expand Their Entry In The Business Market In The Four MSAs At Issue Than Was The Case In Omaha.

While the Commission's predictive judgment that Cox's presence in the Omaha MSA (along with other factors) would constrain Qwest's exercise of market power has proven to be patently wrong, there is even less support for the Commission to make a similar judgment with respect to competition in the Denver, Minneapolis, Phoenix, and Seattle MSAs. Comcast has made far less progress in entering the enterprise market in the MSAs in which it is the dominant cable provider (*i.e.*, Denver, Minneapolis, and Seattle) than Cox had made in Omaha. As Comcast explained in its opposition to Verizon's petitions for forbearance from unbundling obligations in six MSAs,[46] Verizon "clearly exaggerate[ed]" its market share loss to Comcast or other competitors. *Id.* at 3. There, Comcast stated unequivocally that "Verizon does not face competition from Comcast (or anyone else) in Boston, Philadelphia or Pittsburgh anything like Qwest faced in Omaha." *Id.* at 4.

The situation is no different in the four MSAs at issue here. According to the Commission's own data, as of June 2006, ILECs held an 81 percent market share in Colorado, and market shares of 77 percent and 86 percent, respectively, in Minnesota and Washington.[47] Thus, the competition faced by Qwest from Comcast and other non-ILEC providers in the Denver, Minneapolis, and Seattle MSAs is nowhere near the level of competition that the

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[46] Comments of Comcast Corporation, *In re Petitions of Verizon Tel. Cos. for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Boston, New York, Philadelphia, Pittsburgh, Providence and Virginia Beach Metropolitan Statistical Areas*, WC Dkt. No. 06-172 (filed Mar. 5, 2007).

[47] Industry Analysis & Technology Division, Wireline Competition Bureau, FCC, *Trends in Telephone Service*, Table 8.6 (Feb. 2007).

Commission apparently found in the Omaha MSA. Similarly, FCC data indicates that ILECs had a market share of 70 percent in Arizona. *Id.* In light of this evidence and in the absence of any material evidence to the contrary, there is no reason to believe Qwest's exaggerated claims that Cox "has already been successful in serving business customers in the [Phoenix] MSA." Qwest Phoenix Pet. at 23.

Furthermore, in light of the build-buy analysis conducted by TWTC discussed earlier, Qwest's reliance on the FCC's prediction in the *Omaha Order* that Cox would compensate for the limited reach of its network in the Omaha enterprise market by expanding it is misplaced. As explained, there are few commercial buildings to which TWTC could construct loop and transport facilities in the Denver, Minneapolis, Phoenix, and Seattle MSAs. The situation would be no different for Comcast or Cox in these MSAs. This is because, as discussed above, cable companies face many of the same entry barriers as TWTC and other intramodal competitors in this regard, thereby making it unlikely that cable operators will be able to expand the range of their networks in the business market to any significant extent for the purpose of providing DS-1 and individual DS-3-based services.

VII. CONCLUSION.

For the foregoing reasons, Qwest's petitions for forbearance should be denied.

Respectfully submitted,

/s/ Thomas Jones
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Attorneys for Time Warner Telecom Inc., Eschelon Telecom, Inc., and Cbeyond, Inc.

August 31, 2007

REDACTED - FOR PUBLIC INSPECTION

ATTACHMENT A

DECLARATION OF STEPHANIE PENDOLINO

ON BEHALF OF TIME WARNER TELECOM INC.

REDACTED - FOR PUBLIC INSPECTION

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
	)	
Petitions of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Denver, Minneapolis-St. Paul, Phoenix, and Seattle Metropolitan Statistical Areas	)	WC Docket No. 07-97

DECLARATION OF STEPHANIE PENDOLINO ON BEHALF OF TIME WARNER TELECOM INC.

1. I am Director of Business Intelligence Reporting & Analytics for Time Warner Telecom Inc ("TWTC"). I have been employed by TWTC since January 2001 and have worked in the telecommunications industry since 1994. The majority of my time at Time Warner Telecom has been spent performing market development and opportunity analysis, business development, and general business analysis. I graduated from the University of Washington in 1994 with a Bachelor's Degree in Business Administration.

2. The purpose of this Declaration is to describe: (I) the extent to which TWTC has or could viably construct its own transmission facilities to commercial buildings in the four MSAs in which Qwest has requested forbearance (Denver, Phoenix, Seattle, and Minneapolis) and (II) explain why TWTC and other competitors must rely on ILEC loops and why such reliance will increase in the foreseeable future.

I. There Are Few Locations To Which TWTC Has Constructed Transmission Facilities Or Could Construct Transmission Facilities In The Denver, Phoenix, Seattle, and Minneapolis MSAs

3. TWTC builds its own loop and transport facilities whenever it is efficient and cost-effective to do so. In fact, TWTC is likely deploying these facilities at a faster rate than any other non-ILEC in the country. Unfortunately, for a number of reasons discussed herein, there are many locations where TWTC cannot economically construct its own loop facilities.

4. TWTC generally builds its local network in the parts of metropolitan areas containing the largest enterprise customers using fiber SONET ring transport facilities. TWTC constructs SONET rings to very large commercial buildings as part of the original construction of its local transport network in a metropolitan area. In the majority of cases, however, TWTC must build a stand-alone fiber lateral (*i.e.,* loop) facility to a building containing a business customer it seeks to serve on its own network after the customer has agreed to purchase service from TWTC.

5. In assessing whether it is cost-effective to deploy its own loop facilities, TWTC determines whether the revenue opportunity associated with a given building or a given customer is large enough to justify construction. To justify construction, the potential revenue must be sufficient to cover the total cost of construction and recurring expenses and simultaneously achieve a reasonable rate of return on investment. Costs vary based on the distance between TWTC's transport network and the customer location (the longer the lateral facility, the greater the deployment cost), costs associated with obtaining access to poles, ducts, conduits, rights-of-way and commercial buildings, the type of services provided (electronics for higher capacity services generally cost more than electronics for lower capacity services) and the customer's willingness to enter into a longer-term contract. After considering these factors, TWTC is generally able to deploy loop facilities only to those buildings for which customers individually

or collectively demand multiple DS3s of service. A small minority of customer locations meets this revenue requirement. As a result, on a national basis, legacy TWTC (excluding recently acquired Xspedius) served only 27 percent of its customer locations entirely on its own network as of September 2006. As of the end of the second quarter of 2007, TWTC has been able to deploy its own loop facilities to only **[proprietary begin]** **[proprietary end]** of its customer locations in Seattle, **[proprietary begin]** **[proprietary end]** of its customer locations in Minneapolis (a market in which TWTC serves comparatively few customer locations), **[proprietary begin]** **[proprietary end]** of its customer locations in Denver, and **[proprietary begin]** **[proprietary end]** of its customer locations in Phoenix. Moreover, TWTC has only deployed loop facilities to a tiny fraction of the total commercial buildings in these cities. Based on aggregate numbers of commercial buildings with two or more DS1s of bandwidth demand in the four MSAs obtained from GeoResults, TWTC has determined that, as of June 30, 2007, TWTC had constructed loops to only **[proprietary begin]** **[proprietary end]** of the commercial buildings in the Denver MSA, **[proprietary begin]** **[proprietary end]** of the commercial buildings in the Minneapolis MSA, **[proprietary begin]** **[proprietary end]** of the commercial buildings in the Phoenix MSA, and **[proprietary begin]** **[proprietary end]** of the commercial buildings in the Seattle MSA.

6. In addition, TWTC recently conducted a build-buy analysis, taking into account the aforementioned factors, for the four Qwest MSAs at issue in order to identify the buildings in those areas to which TWTC could potentially deploy loop facilities in the future. In conducting the build-buy analysis, we made two basic assumptions. First, we assumed that TWTC must earn an approximate monthly recurring revenue ("MRR") per building of **[proprietary begin]**

[proprietary end] to justify construction of loop facilities under the best of conditions. This amount is the approximate MRR required to reach the target on-net building internal rate of return ("IRR") of **[proprietary begin]** **[proprietary end]** that TWTC uses in the marketplace. This assumption includes an estimated average cost of **[proprietary begin]** **[proprietary end]** including electronics, to deploy a loop facility to a customer location in a Tier 1 MSA (all four MSAs at issue are Tier 1 MSAs). Hypothetically, the **[proprietary begin]** **[proprietary end]** revenue threshold can be met in any number of ways using a combination of customer sizes and services. For example, a small business customer purchasing VersiPak, TWTC's integrated voice and data T1 product, spends an average of **[proprietary begin]** **[proprietary end]** per month with TWTC. Assuming that the customer signs a two-year contract, TWTC would need to provide services to ten other like customers in a building in order to procure a total MRR of **[proprietary begin]** **[proprietary end]**. In another example, a large business customer purchasing TWTC's Metro Ethernet solution spends an average of **[proprietary begin]** **[proprietary end]** per month with TWTC. Assuming that the customer commits to a three-year agreement and the customer has two locations (making TWTC's cost to build **[proprietary begin]** **[proprietary end]** TWTC would need to serve an additional like customer in one of the two buildings in order to come close to meeting the **[proprietary begin]** **[proprietary end]** revenue threshold. Practically speaking however, we require a firm commitment from one or several customers to justify the build and will not undertake a build until that commitment is secured. Thus in the majority of build scenarios there must be at least one larger business customer who has committed to a level of service that can meet our minimum MRR threshold to justify a build.

7. Second, TWTC assumed that it can win **[proprietary begin]** **[proprietary end]**of the revenue opportunity in a commercial building. This is an aggressive assumption, since TWTC by no means achieves this level of penetration in every building.

8. Using these assumptions, TWTC estimated that it might be able to construct loop facilities to buildings with **[proprietary begin]** **[proprietary end]** per month in estimated telecommunications spending. TWTC then relied on GeoResults data estimating the revenue spend in the commercial buildings with two DS1s of demand or more in the four MSAs in question to determine the percentage of such buildings to which TWTC has not constructed its own loops ("non-TWTC buildings") but to which it *might* be able to do so in the future. Based on this analysis, TWTC determined that it might be able to build to only **[proprietary begin]** **[proprietary end]** of the non-TWTC buildings in the Denver MSA, **[proprietary begin]** **[proprietary end]** of the non-TWTC buildings in Minneapolis, **[proprietary begin]** **[proprietary end]** of the non-TWTC buildings in Phoenix, and **[proprietary begin]** **[proprietary end]** of the non-TWTC buildings in Seattle. The total number of such buildings to which TWTC has built or (assuming that barriers to entry are overcome) could theoretically build loops in each market is summarized in Table 3 below:

[proprietary begin]

[proprietary end]

9. It should be noted that this build-buy analysis does not account for the fact, as explained, that TWTC generally cannot begin building its own loops unless and until potential customers in a given building in fact commit to purchasing the high revenue services that justify loop construction. This is why, even in these four markets where TWTC has built its own facilities, there remain numerous potential customers in buildings to which TWTC could theoretically, but cannot practically, afford to build loop facilities.

II. TWTC And Other Competitive Carriers Rely Extensively On ILEC Transmission Facilities And Such Reliance Is Only Likely To Increase

10. In my experience, for those locations where TWTC cannot deploy its own loop facilities, it has no other choice but to rely on the ILEC's—in this case, Qwest's—loop facilities to reach its customers. This is because Qwest usually owns the only loop facility serving locations to which TWTC cannot efficiently deploy its own facilities.

11. TWTC's and other competitors' reliance on ILEC inputs to serve a very large number of customer locations is only likely to increase in the foreseeable future. This is because customers are increasingly demanding that carriers serve most or all of their locations. Thus,

whereas a ten-location customer might previously have required that TWTC serve only its two largest locations, it is more likely today to demand that TWTC serve all ten of its locations. While TWTC might have been able to construct loops to the two largest locations that generate the most revenue, it is unlikely to be able to construct loops to the smaller locations, which can generate well under $1000 per month in revenue. To reach those locations, TWTC is dependent on Qwest loops. If TWTC cannot obtain access to Qwest's loop facilities on reasonable terms and conditions, it cannot profitably serve all of the customer's ten locations, even if it had been economically feasible to construct loops to the larger locations. In other words, in order to justify constructing loops to multiple customer locations, it is more and more important that TWTC be able to purchase loops from Qwest on reasonable terms and conditions.

I declare under penalty of perjury that the foregoing is true and correct.

Stephanie Pendolino

Stephanie Pendolino

Dated: August 30, 2007

ATTACHMENT B

DECLARATION OF DAVID A. KUNDE

ON BEHALF OF ESCHELON TELECOM, INC.

REDACTED - FOR PUBLIC INSPECTION

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
	)	
Petitions of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Denver, Minneapolis-St. Paul, Phoenix, and Seattle Metropolitan Statistical Areas	)	WC Docket No. 07-97

DECLARATION OF DAVID A. KUNDE
ON BEHALF OF ESCHELON TELECOM, INC.

1. I am the Executive Vice President of Network Operations and Engineering for Eschelon Telecom, Inc ("Eschelon") and have been employed by Eschelon since 1999. From 1994 until joining Eschelon in May 1999, I held the positions of Vice President of Network Engineering and Director of Network Engineering and Operations at Citizens Communications. From 1986 to 1994, I held a variety of positions with Rochester Telephone. I have a BA in Physics and Math from Wittenberg University in Springfield, Ohio and an MBA from the University of Rochester's William E. Simon Graduate School.

2. Eschelon is a leading facilities-based provider of integrated voice and data communications services to small and medium-sized businesses in nine states across the western United States. Eschelon operates in each of the metropolitan statistical areas ("MSAs") that are the subject of Qwest's forbearance request—Denver, Minneapolis-St. Paul, Phoenix, and Seattle.

3. Eschelon commenced business in 1996 as a reseller; however, the company migrated to a facilities-based model and has installed and operates 6 voice switches and has approximately 90 collocations in the four MSAs at issue. While it deploys its own switches and collocations, Eschelon is not able to self-provision loop facilities. Rather, the company leases

loop and transport facilities from wholesale providers, usually as unbundled network elements ("UNEs") from incumbent LECs.

4. The purpose of my declaration is to: (I) describe the extent to which non-ILEC wholesalers offer loop and transport facilities in the four MSAs that are the subject of Qwest's forbearance request; and (II) describe the extent to which Eschelon has faced intermodal competition from cable companies.

I. Non-ILEC Wholesale Providers Of Loop and Transport Facilities in the Denver, Minneapolis, Phoenix, and Seattle MSAs Are Extremely Limited

5. Eschelon would prefer to build, own and operate all of the facilities involved in serving its customers, to the extent possible. However, it is not economically feasible for Eschelon to self-deploy its own loop and transport facilities. This is especially true with regard to loops, because the majority of small and medium enterprise ("SME") customers that Eschelon serves do not generate sufficient revenue or commit to long enough contracts to justify construction of loop facilities. Nor is it economically feasible for Eschelon to deploy transport along routes where traffic volumes are relatively low, *e.g.*, less than three DS3s of capacity. Moreover, even if it were theoretically rational to construct loop or transport facilities, there are numerous obstacles associated with large-scale loop or transport self-deployment, including lack of space in existing conduits and municipalities' increasing unwillingness to permit access to public rights-of-way already overburdened by other utilities. These real word obstacles often prevent deployment of loop or transport facilities in locations that might theoretically support such construction.

6. Where possible, Eschelon would prefer to purchase loop and transport facilities from non-ILEC wholesale providers. Unfortunately, the marketplace reality is that few such alternatives exist. Eschelon's experience is that there are virtually no wholesale providers of

DS1 or DS3 loops in the locations in which Eschelon offers service in the four MSAs in which Qwest has requested forbearance. Moreover, many Eschelon collocations cannot be served by a non-ILEC wholesale transport provider. The problem is especially acute in Phoenix and Denver. In the Phoenix MSA, Eschelon is collocated in **[proprietary begin]** **[proprietary end]** central offices but Eschelon has not been able to identify a single non-ILEC wholesale transport provider **[proprietary begin]** **[proprietary end]** of those central offices. Similarly, in the Denver MSA, Eschelon has not been able to identify a single non-ILEC wholesale provider of transport in **[proprietary begin]** **[proprietary end]** central offices in which Eschelon is collocated. The Phoenix and Denver central offices in which there are no providers of wholesale transport other than Qwest are listed in Exhibit 1 to this declaration.

II. Eschelon Faces Virtually No Intermodal Competition From Cable Or Wireless Providers

7. In my experience, intermodal alternate providers are not viable competitors to Eschelon and other competitive local exchange carriers ("CLECs"). Cable plant typically passes residences, not businesses. In addition, cable operators cannot provide all of the services that Eschelon offers to small and medium-sized businesses. As a result, Eschelon's SME customers do not view cable providers as viable alternatives to Eschelon. In fact, from the first quarter of 2004 through the end of the second quarter of 2007, Eschelon lost a total of **[proprietary begin]** **[proprietary end]** in the entire state of Colorado to Comcast. This figure translates to an average cable churn (the number of circuit losses to cable divided by the estimated number of circuits in the state during the relevant quarter) of **[proprietary begin]** **[proprietary end]** for each quarter for the past ten quarters. Likewise, Eschelon lost a total of **[proprietary begin]** **[proprietary**

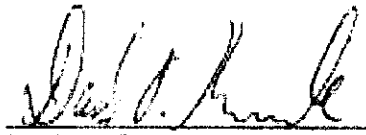
end] in Washington to Comcast during the same period. The average quarterly cable churn during the period was **[proprietary begin]**

[proprietary end] in Washington. In Arizona, Eschelon lost a total of **[proprietary begin]**

[proprietary end] to cable provider Cox from the first quarter of 2004 through the second quarter of 2007. Even in Arizona, however, Eschelon's cable churn rate for the second quarter of 2007 was **[proprietary begin]** **[proprietary end]** and the average quarterly cable churn over the ten-quarter period was only **[proprietary begin]**

[proprietary end]

I declare under penalty of perjury that the foregoing is true and correct.



David A. Kunde

Dated: August 31, 2007

[Proprietary Begin]

[Proprietary End]

[Proprietary Begin]

Declaration of David A. Kunde
Exhibit 2

[Proprietary End]

REDACTED - FOR PUBLIC INSPECTION

ATTACHMENT C

DECLARATION OF RICHARD J. BATELAAN

ON BEHALF OF CBEYOND, INC.

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
	)	
Petitions of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Denver, Minneapolis-St. Paul, Phoenix, and Seattle Metropolitan Statistical Areas	)	WC Docket No. 07-97

DECLARATION OF RICHARD J. BATELAAN
ON BEHALF OF CBEYOND, INC.

1. I am the Chief Operating Officer for Cbeyond, Inc. ("Cbeyond"). I have more than twenty years of experience in the telecommunications industry and have been employed by Cbeyond since 2001. I manage Cbeyond's operating units including customer care, field operations, systems operations, network operations, network planning, provisioning, service activation and ILEC relations. Before joining Cbeyond in 2001, I was cofounder and chief operations officer of BroadRiver Communications, a provider of Voice Over IP (VOIP), Internet access and VPN services. Prior to BroadRiver, I spent 12 years with BellSouth, a regional ILEC based in Atlanta which has since been purchased by AT&T. I held various roles at BellSouth including engineer, director of technical support for BellSouth Business Systems, director of operations for BellSouth Business System's data customer support center and various positions at BellSouth's data division, BellSouth.net, including director of network operations, director of engineering, vice president of operations, and chief operations officer. I hold